

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:

SAMUEL E. WYLY,

DEBTOR

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Case No. 14-35043

Chapter 11

**NOTICE OF FILING OF
DEBTOR'S SCHEDULE OF BANK ACCOUNTS (FILED FOR THE SEC)**

PLEASE TAKE NOTICE that, on the petition date, October 19, 2014, the Debtor had funds on deposit in his bank accounts with the following institutions:

Institution	Account # (Last 4)	Amount
BBVA Compass Bank	0274	\$5,298,467.04
BBVA Compass Bank	1463	\$6,413,479.14
BBVA Compass Bank	0711	\$4,822.55
BBVA Compass Bank	0290	\$6,862.39
BBVA Compass Bank	1540	\$866,021.72
JP Morgan Brokerage Account		\$224,186.52

The only disbursement from such funds to date has been the \$26,292 distributed to BBVA Compass Bank ("Compass Bank") as approved by the Bankruptcy Court in the *Interim Order Authorizing Limited Use of Cash Collateral and Granting Adequate Protection* (Doc. No. 57). Per the guidelines of and in consultation with the United States Trustee, the Debtor has set up his debtor-in-possession bank account with Plains Capital Bank (last four digits of the account number are 7156). On Friday, October 31, 2014, the Debtor again requested Compass Bank to transfer the Debtor's funds to Plains Capital Bank.

The Debtor is advised that Compass Bank has placed an administrative freeze of \$5.75 million of the above funds to protect its approximately \$4 million offset right that, under Bankruptcy Code § 506(a), constitutes a secured claim. The Debtor also has been advised that Compass Bank is now filing its motion addressing its administrative freeze.

The foregoing is the schedule of the Debtor's funds and bank accounts; for the benefit of the Securities and Exchange Commission, such funds and accounts are property of the estate and under the control and supervision of the Bankruptcy Court.

Dated October 31, 2014

Respectfully submitted,

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PROPOSED COUNSEL FOR THE DEBTOR

CERTIFICATE OF SERVICE

I certify that on October 31, 2014, a copy of the foregoing document was served by (i) the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas, which gives notice to all counsel of record and (ii) U.S. first-class mail, postage pre-paid to those parties listed on the attached Limited Master Service List.

/s/ Josiah M. Daniel, III
One of Counsel